

JUDGE RAXOFF

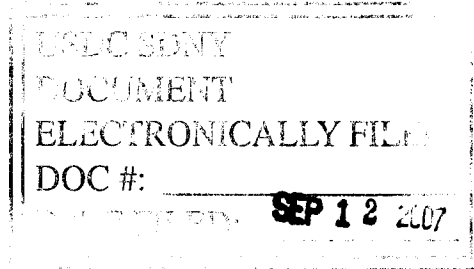
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ANGEL PEREZ,  
CARMEN PATRON, and  
MANUEL CONCEPCION,  
a/k/a "Santiago Figueroa,"

Defendants.



INDICTMENT

07 CRIM 866

COUNT ONE

The Grand Jury charges:

1. From in or about July 2007 through in or about August 2007, in the Southern District of New York and elsewhere, ANGEL PEREZ, CARMEN PATRON, and MANUEL CONCEPCION, a/k/a "Santiago Figueroa," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and object of the conspiracy that ANGEL PEREZ, CARMEN PATRON, and MANUEL CONCEPCION, a/k/a "Santiago Figueroa," the defendants, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 100 grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(B).

OVERT ACTS

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York:

a. On or about August 30, 2007, ANGEL PEREZ, CARMEN PATRON, and MANUEL CONCEPCION, a/k/a "Santiago Figueroa," the defendants, met in the vicinity of a rest stop parking lot in the Bronx, New York, in order to exchange more than 100 grams of heroin.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. On or about August 30, 2007, in the Southern District of New York, ANGEL PEREZ, CARMEN PATRON, and MANUEL CONCEPCION, a/k/a "Santiago Figueroa," the defendants, unlawfully, intentionally, and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, 100 grams and more of mixtures and substances containing a detectable amount of heroin.

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(B); Title 18, United States Code, Section 2.)

**FORFEITURE ALLEGATIONS AS TO COUNTS ONE AND TWO**

5. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, ANGEL PEREZ, CARMEN PATRON, and MANUEL CONCEPCION, a/k/a "Santiago Figueroa," the defendants, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Indictment, including but not limited to proceeds obtained as a result of the offenses described in Counts One and Two of this Indictment.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

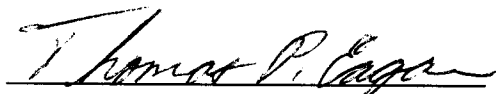
d. has been substantially diminished in value;

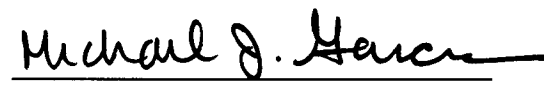
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. §853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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INDICTMENT

07 Cr. \_\_\_\_\_

(Title 21, United States Code,  
Sections 812, 841(a)(1),  
841(b)(1)(A), and 846; Title 18, United  
States Code, Section 2)

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MICHAEL J. GARCIA  
United States Attorney

A TRUE BILL.

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Foreperson.

9/12/07  
SS

Case assigned to J. Rakoff  
M. J. Housh